



Alameda County
**Social Services
Agency**

Denise Robinson
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Chet P. Hewitt, Agency Director

November 4, 2009

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Ramon S. Lopez, Chief
Civil Rights Bureau
Human Rights and Community Services
Department of Social Services
744 P Street
Sacramento, CA 95814

Dear Mr. Lopez:

I am pleased to submit the Alameda County Social Services Agency's response to your Bureau's Civil Rights Compliance Review Report. Our response outlines the steps we must take in order to more fully comply with Division 21 requirements.

If you have any questions or need additional information you may contact Darleen Brooks, Agency Civil Rights Officer at (510) 891-3355.

Sincerely,


Yolanda Baldovinos
Agency Director

Attachments

cc: Denise Robinson, Human Resources Director
Darleen Brooks, Civil Rights Officer

DISSIMINATION OF INFORMATION

FACILITY ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES

Informational Element	Corrective Action/Timeline
<u>Distribution of CDSS' Pub 13 (Findings)</u> Alameda County shall ensure that Pub 13 pamphlet, "Your Rights Under California Welfare Programs" is both given and explained to program participants in all of the programs which CDSS has oversight responsibility.	Alameda County will ensure that Pub. 13 "Your Rights Under California Welfare Programs" are provided and explained in the waiting rooms at all facilities. The Civil Rights Officer will remind staff through the agency on-line bulletin board where to access Pub. 13 pamphlets. The Civil Rights Officer will conduct random site visits to ensure Pub. 13 pamphlets are provided to program participants.
<u>Translated Pub 13 (Findings)</u> Alameda County shall ensure that the current version of the Pub 13 is available in all languages translated by CDSS and that the available translated versions are given to the clients in their primary language.	The Civil Rights Officer shall ensure that each office is provided with the current translated version of the Pub.13. Staff will be reminded through the agency bulletin board where to access Pub. 13 pamphlets on-line. The Civil Rights Officer will remind staff through the agency on-line bulletin board where to access translated version of Pub. 13 pamphlets.
<u>Auxiliary Aids (Findings)</u> Alameda County shall ensure the availability of large print, Braille, and auditory aids for participants in all the programs for which CDSS has oversight responsibility.	During the Civil Rights Audit each department was provided with large print, Braille, and auditory aids for participants. The Civil Rights Officer will re-issue the Civil Rights Resource Guide to Department Heads, Division Directors and Program Managers to distribute to all staff. The Civil Rights Resource Guide is a valuable resource tool. Remind staff the resource guide is available on-line

Facility Location: 2000 San Pablo, North Oakland Self Sufficiency

<p>Parking –(Findings) There is no “unauthorized parking signage at entrance to off street accessible parking.</p>	<p>Corrective Action/Timeline</p> <p>The General Service Agency is currently working on completing this requirement</p>
<p>Parking – Additional sign shall be posted in conspicuous place at entrances to off-street parking facilities, or adjacent to and visible from each space. Sign shall be 17” by 22” min. in size with lettering 1” min. high, stating : “Unauthorized vehicles parked in designated accessible spaces not displaying distinguishing placards or license plates issued for persons with disabilities may be towed away at owner’s expense. Towed vehicles may be reclaimed at _____ or by telephoning _____.” (CA T241129B.5)</p>	<p>The General Service Agency is currently working on completing this requirement</p>
<p>Exterior-First floor main entrance door pressure excessive at 16 lbs. Force to open doors, exterior and interior is 5 pounds maximum (CAT241133B.2.5, ADA 4.13.11(2) (a) & (b) p. 195. Outside signage-(ISA) International Symbol of Accessibility sign is missing at both entrances. A sign with the international symbol of accessibility shall be at every primary entrance and every major junction indicating the direction along or to accessible features. (CA T241127B.3, ADA 4.1.3(16B), CA T241117B.58.1.2) pp. 183, 353</p>	<p>Door pressure may not be adjusted otherwise the doors will not close due to building pressure caused by HVAC, hence the auto door openers. Completed</p>
<p>Client Lobby-Poster: Everyone is Different, but Equal under the Law was missing the CRC contact information. Current Poster: “Everyone is Different, but Equal under the Law”, 12/99, 3/07, with current CRC information (Div 21-107.211) No Pub. 13 pamphlets were available for public in all required languages. Current Pub. 13 pamphlets: Pamphlets supplied by CDSS entitled “Your Rights Under California Welfare Programs” shall be made available in all CWD waiting rooms and reception areas. 05/01 or 01/04 (Div 21-107.221)</p>	<p>Alameda County will ensure that Pub. 13 “Your Rights Under California Welfare Programs” , “Everyone is Different, but Equal under the Law” are provided and explained in the waiting rooms at all facilities. The Civil Rights Officer will ensure that current posters, and pamphlets are available in required languages.</p>
<p>Men’s Restroom-First floor restroom door pressure excessive at 9 lbs. Interior door will have 5 lbs maximum pressure. (CA T241133B.2.5, ADA 4.13.11 (2) (b) p.195- Second floor restroom door pressure excessive at 11 lbs. Interior door will have 5 pounds maximum pressure. (CA T24.133B.2.5, ADA 4.13.11 (2) (b) p. 195</p>	<p>Completed</p>
<p>Women’s Restroom-First floor restroom door pressure excessive at 12 lbs. Interior door will have 5 lbs. Maximum pressure. (CA T24.133B.2.5, ADA 4.13.11 (2) (b) p. 195 Second floor restroom door pressure excessive at 10 lbs. Interior door will have 5 lbs. Maximum pressure. (CA T24.1133B.2.5., ADA 4.13.11 (2) (b) p. 195</p>	<p>Completed</p>

Facility Location: Foothill Blvd., Adult & Aging Services Eastmont Town Center

Facility Element (Findings)	Corrective Action/Timeline
<p>Parking-Signage on pavement does not clearly depict a wheelchair w/occupant due to being faded. Needs to be repainted. Pavement signage shall be 36"x 36" minimum, white on blue in color, visible and centered. (CA 524 1129B.5.1 & 2) p. 133 No "No Parking" painted on pavement in access aisles (letter min. 12" high). The words "NO PARKING" shall be painted on the ground in each 5' or 8' loading and unloading access aisle in white letters no smaller than 12". (CA 524 1129B.4.1 & 2) p. 135 An access aisle does not connect to the accessible path of travel. Access aisles (load and unload) must connect to the accessible path of travel, including curb cuts or ramps as needed (CA T24 1129B.4.3, ADA 4.6.3) p 136 Walkways minimum 48" (CA T24 1133B.7.1) p. 160</p>	<p>Landlord is working with contractor to complete</p>
<p>Outside signage (ISA) International Symbol of Accessibility sign is missing on main entrance and A & A lobby. A sign with the international symbol of accessibility shall be at every primary entrance and every major junction indicating the direction along or to accessible features. No ISA signs-non-glare finish, color contrast. Characters, symbols and their backgrounds have a non-glare finish. Characters and symbols contrast with their background, either light characters on a dark background or dark characters on a light background.</p>	<p>Landlord is working with contractor to complete</p>
<p>Client Lobby-No Pub. 13 pamphlets were available for public in all required languages. Current: 05/01 or 01/04. Elevator-Accessible elevator entrance was not marked accessible with the International Symbol of Accessibility. Entrances that are accessible to and usable by person with disabilities are identified with at least 1 International Symbol of Accessibility. Additional directional signs using the symbol are visible along approaching pedestrian ways.</p>	<p>The Civil Rights Officer will ensure that Pub. 13 pamphlets are made available for the public in all required languages and are current.</p> <p>Landlord is working with contractor to complete</p>
<p>Women's Restroom -Soap dispenser too high at 50". If towel, sanitary napkins, waste receptacles, and other similar dispensing and disposal fixtures are provided, at least one of each type is located with all operable parts, including coin slots, at a maximum height of 40".</p>	<p>Landlord is working with contractor to complete</p>

Facility Location : 24100 Amador Street

Facility Element (Findings)	Corrective Actions/ Timeline
<p>Parking (Shared) –There is no “unauthorized parking” signage at entrance to off-street accessible parking. Additional sign shall be posted in conspicuous place at entrances to off-street parking facilities, or adjacent to and visible from each space. Sign shall be 17” by 22” min. in size with lettering 1” min. high, stating: “Unauthorized vehicles parked in designated accessible spaces not displaying distinguishing placards or license plates issued for persons with disabilities may be towed away at owner’s expense. Towed vehicles may be reclaimed at ____ or by telephoning ____.”</p> <p>Four freestanding handicapped signs (in front of building) are too low at 30” high. Sign height shall be 80” minimum from bottom of sign to top of finish grade. Wall signage shall be centered 36” minimum above grade, ground, or sidewalk at the interior end of space.</p>	<p>On order by the Landlord</p> <p>Completed</p>
<p>Outside signage-(ISA) International Symbol of Accessibility sign is missing on downstairs lobby entrance, and on second floor lobby entrance. (Main building entrance did have ISA). A sign with the International Symbol of Accessibility shall be at every primary entrance and every major junction indicating the direction along or to accessible features. No ISA signs-non-glare finish, color contrast. Characters, symbols and their backgrounds have a non-glare finish. Characters and symbols contrast with their background, either light characters on a dark background or dark characters on a light background.</p>	<p>Completed</p> <p>Completed</p>
<p>Client Lobby–No Pub. 13 pamphlets were available for public in all required languages. Current Pub. 13 pamphlets: 05/01 or 01/04</p>	<p>The Civil Rights Officer will ensure that Pub. 13 pamphlets are made available for the public in all required languages and are current.</p>
<p>Men’s Restroom–First floor restroom door pressure excessive at 15 lbs. Interior door will have 5 lbs. Maximum pressure. Second floor restroom door pressure excessive at 12 lbs. Interior door will have 5 lbs. Maximum pressure</p>	<p>Completed</p>
<p>Women’s Restroom–First floor restroom door pressure excessive at 17 lbs. Interior door will</p>	<p>Completed</p>

have 5 lbs maximum pressure. Second floor restroom door pressure excessive at 18 lbs. Interior door will have 5 lbs. Maximum pressure. First floor restroom pipes under sink not securely insulated (pipes under sink closest to door). Hot water and drain pipes are insulated or covered. No sharp or abrasive surfaces under lavatories.	
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Documentation of Applicant/Recipient Case Records

Findings	Corrective Actions/Timeline
Documentation if client provided own interpreter. When applicants/recipients provide their own interpreter, the CWD shall ensure that the applicants/recipients are informed of the potential problems for ineffective communication. The CWD shall document in the case record that the applicants/recipients were so informed.	In September 2004, the department developed a release of information form for individuals used as interpreters to sign during meetings held with families. The current Language Preference Survey Form includes a section to capture this information. This information is notated in the case file.
Temporary use of minor (under 18 years of age) as an interpreter. When a minor (under 18 years of age) is used as an interpreter, the CWD shall so document the circumstances requiring temporary use of minors in the case record. Only under extenuating circumstances or at the specific request of the applicant/recipient shall a CWD allow a minor (under the age of 18 years) to temporarily act as an interpreter.	In 2004 the department developed a release of information/Language Survey form for individuals used as interpreters to sign during meetings held with families. The department will ensure the release forms are completed and documented in the case files. Additionally, the department will ensure that minors are used only under extenuating circumstances. It is not common practice of the department to use minors.
Documentation -of interpreter signed confidentiality statement. Consent for the release of information shall be obtained from applicants/recipients when individuals other than CWD employees are used as interpreters and the case record shall be so documented.	In 2004 the department developed a release of information/Language Survey form for individuals used as interpreters to sign during meetings held with families. The department will ensure the release forms are completed and documented in the case files. Additionally, the department will ensure that minors are used only under extenuating circumstances. It is not common practice of the department to use minors.
Documentation that bilingual services were provided -Document the method used to provide bilingual services, e.g., assigned worker is bilingual other bilingual employee acted as interpreter, volunteer interpreter was used, or client provided interpreter.	The current Language Preference Survey forms include a section to capture this information; however, it will be more closely monitored to ensure that it is completed.
General -Alameda County must ensure that proper documentation is kept in the file that identifies all the required elements to ensure compliance.	Managers will monitor that cases are documented.

Staff Development and Training

Findings	Corrective Action/Timeline
Division 21, Civil Rights Training -Alameda County shall ensure that employees receive Division 21 Civil Rights training at the time of orientation, as well as ongoing training to ensure that public contact staff has knowledge of Division 21, including familiarization with the discrimination complaint process.	Alameda County will continue to ensure that Division 21 training is provided to all employees. Classes are scheduled during induction and/or during the first 6 months of employment, and then every two years thereafter for all staff. The Staff Development & Training Consulting (HRCT) requires employees to register for classes using their employee ID number and sign the class roster. This process provides a permanent tracking to ensure that all staff has met the Division 21 mandated training requirements.

Discrimination Complaint Procedures

Findings	Corrective Action Taken/Timeline
Counties are required to maintain a process for addressing all complaints of discrimination. They must track complaints of discrimination through the use of a control log in which all relevant information is kept, including when the complaint was received, the name of the complainant, identifying numbers and programs, basis of discrimination, and resolution. It is usually the Civil Rights Coordinator responsibility to maintain this log.	Alameda County will continue to ensure a process is maintained for addressing all complaints of discrimination. The Civil Rights Officer will continue to track complaints of discrimination through the use of a control log with all relevant information.